

Sent by email to: adurplanningpolicy@adur-worthing.gov.uk

03/01/2025

Dear Sir/ Madam

Adur Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the key issues to be addressed by the Adur Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Housing

2. The HBF primary concern is that the council take a positive approach to meeting housing needs in recognition of the housing crisis and the particular pressure faced by coastal authorities such as Adur in meeting housing needs. Using the latest standard method the council will need to prepare a local plan that seeks to deliver at least 558 dwellings per annum (dpa). HBF recognises this will be challenging given that over half the Borough is covered by National Park, which is tightly bound to the urban edge of the settlements in Adur. Therefore, in the first instance the council must seek to identify all possible opportunities for development in the area and ensure that development is maximised on those sites. In particular the HBF suggest that detailed consideration is given by the Council to its use of Green Gaps as currently established in the adopted local plan and taking a positive approach to working with the South Downs National Park Authority to identify development opportunities on the edge of the urban area.

3. As the Council will be aware gaps have no specific basis in national policy and should therefore not be considered to be an absolute constraints to development and must in no circumstances be given the same weight as the constraints set out in footnote 7 to paragraph 11 of the NPPF. The Council must as part of this local plan look at opportunities to allocate land in these area to meet as much the development needs of Adur as possible. It is appreciated that the Council may not wish the visual gap between settlements to be diminished the adverse impacts of this must demonstrably and significantly outweigh the benefits of delivering additional homes. As the Council acknowledge in 2023 house prices in Adur are 13.95 times higher than earnings, almost double the ratio 20 years earlier. Alongside these high house prices there is a significant need for affordable housing with nearly a 1,000 households on the housing waiting list. However, to address these needs Adur delivered just 20 affordable homes in 2022/23. There are clearly significant benefits from delivering housing that are clearly not outweighed by the adverse impacts arising from a reduction in the gap between settlements.
4. However, if housing needs cannot be met in full then the Council will need to ensure any unmet needs are addressed in neighbouring areas given that any unmet need in Adur will add to significant needs across this sub region. At present it is estimated that in the Coastal West Sussex and Greater Brighton authorities' unmet needs to 2050 are in the region of 30,000 homes¹, yet despite this joint working between LPAs in the area have not yielded any additional homes to address these unmet needs. This is not acceptable and means that the growing need for both market and affordable homes will be unmet, with consequential negative impacts on housing affordability and health and wellbeing. Adur must, with the other constrained authorities, in the area look to challenge those neighbouring areas that are less constrained to increase the supply of homes beyond that required by the standard method. Only through a more strategic approach to housing supply across the sub region is there any chance that housing needs will be met in full.
5. As part of the duty to co-operate the Council will also need to work closely with the South Downs National Park Authority to identify land on the edge of the urban area but inside the national park that could be allocated for development. While the NPPF states in paragraph 189 that the scale and extent of development in these areas should be limited it must also be recognised that there will be opportunities for development in the national park where these are sensitively located and where adverse impacts can be minimised. HBF would

¹ H5 Housing Need and Requirement Topic Paper July 2024 (Mid Sussex DC)

suggest that a review of land on the edge of the urban area but within the National Park is undertaken to proactively identify development opportunities which would have minimal impact on the landscape and scenic beauty of the national park.

Climate change

6. The HBF recognise the need to mitigate the impact of development in relation to climate change and contribute the national goal of carbon zero by 2050. As the Council recognise this will be achieved through the delivery of consistent national standards applied through Building Regulations. The introduction of the Future Homes Standard for example will see all new homes delivery a 75% reduction in carbon emissions compared to the 2013 regulations, as well as being zero carbon ready. This means that these homes will emit no carbon at source and will be zero carbon once the national grid decarbonises, which is expected to be achieved by 2035.

Biodiversity

7. The Council mention on page 12 that the Council can set local requirements for biodiversity net gain. Paragraph 74-006 of Planning Practice Guidance states that plan makers should not seek a higher percentage than the statutory objective of 10% unless justified. The HBF does not consider there to be any need for Arun to go beyond the 10% minimum required by the Environment Act and which is sufficient to not only ensure no net loss in biodiversity but to ensure positive outcomes for biodiversity as a result of new development.
8. Rather than seek to require more from development the HBF would suggest that the Council work with the relevant bodies in developing an effective Local Nature Recovery Strategy that supports offsite delivery of net gains to the most appropriate strategic locations, and which maximise gains across Adur and West Sussex. This will be particularly important in Adur where development in the urban area will be a key focus given the constraints it faces. A more focussed approach to offsite delivery either in Adur or elsewhere in Sussex will have significantly more benefit for biodiversity than piece meal delivery on sites in Adur itself. More offsite delivery will also allow delivery on sites in Adur to be maximised.

Conclusion

9. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt MRTPI

Planning Manager – Local Plans

Home Builders Federation

Email: mark.behrendt@hbf.co.uk

Tel: 07867415547